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August 31, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

**NOTICE OF EX PARTE
CONTACT**

Re: Connect America Fund WC Docket No. 10-90, et. al

Dear Ms. Dortch:

On August 31, 2011, Fritz Hendricks, President, and Scott Sawyer, General Counsel, both of Minnesota Independent Equal Access Corporation ("MIEAC") and the undersigned met with John Hunter, Victoria Goldberg, and Doug Slotten of the Competition Pricing Division of the Wireline Competition Bureau to discuss certain intercarrier compensation issues. The attached presentation summarizes the views expressed and the points discussed in the meeting.

Please feel free to contact me with any questions.

Thank you very much for your consideration.

Sincerely,



Albert H. Kramer
*Attorney for Minnesota Independent Equal
Access Corporation*

AHK/rw

cc: **(Via E-Mail)**

Mr. John Hunter
Ms. Victoria Goldberg
Mr. Doug Slotten

MINNESOTA INDEPENDENT EQUAL ACCESS CORPORATION (“MIEAC”)

Comments in Support of the Commission’s Proposed Access Stimulation Rules

Fritz Hendricks, President
MIEAC

Scott Sawyer, General Counsel
MIEAC

Albert H. Kramer
PLCC

August 31, 2011

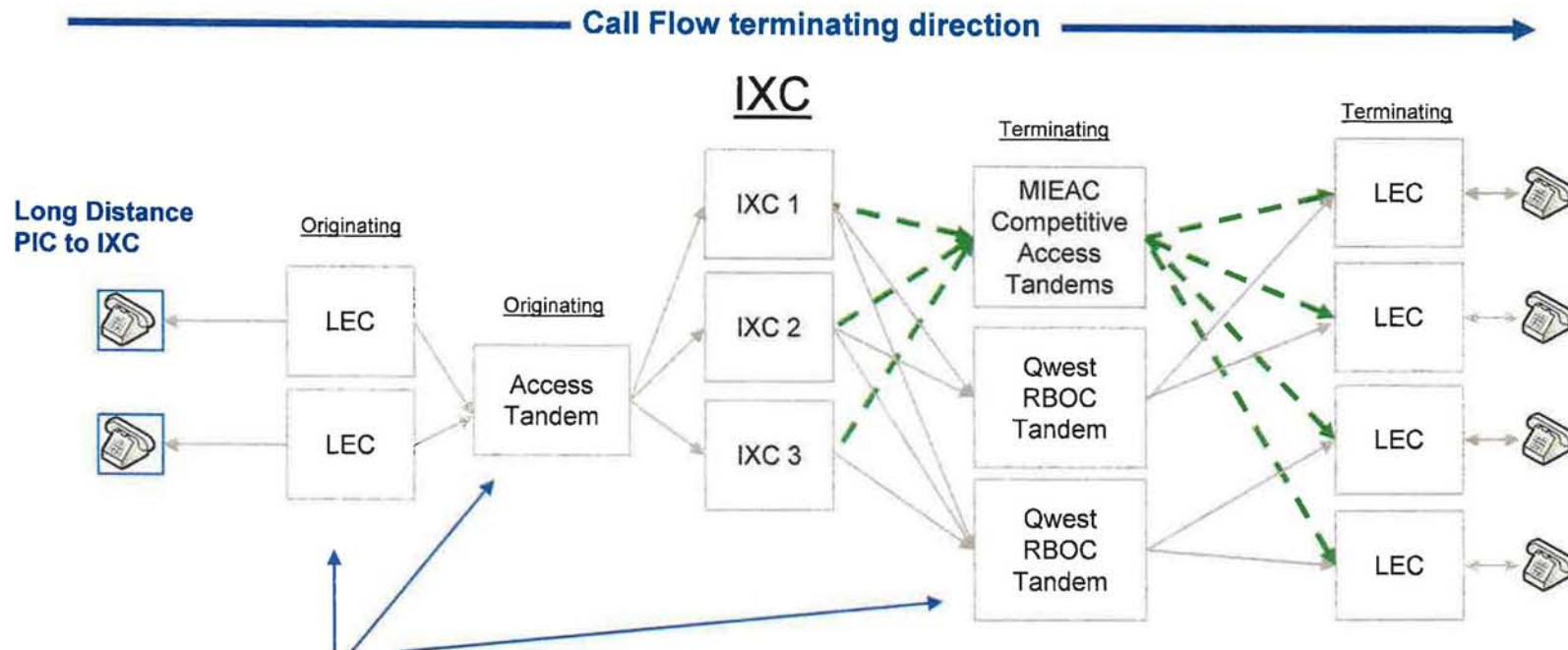
MIEAC Service

Who is MIEAC?

- MIEAC is an alternative tandem provider connecting IXC's and Rural LECs in Minnesota
- Service interconnects 47 IXCs and ~ 95 Minnesota Rural LECs
- The IXC, MIEAC's customer, orders service from MIEAC to a point of termination (POT)
- For interstate, most IXC's POT is in Minneapolis
- MIEAC delivers originating and terminating IXC traffic between the IXC POT and several Points of Interconnect (POI) with LECs distributed throughout Minnesota
- Distribution network bridges the middle mile between major metro and rural cities – service is carried over a high availability (diverse and redundant) fiber and SONET infrastructure
- POI are in the same service location as the RBOC tandem service, RLECs interconnect and bill for transport to the closest RBOC equivalent POI
- The rural LECs designate MIEAC as the tandem in the LERG

MIEAC – In the Terminating Call Flow

Commission's Proposed Access Stimulation rules relate to MIEAC primarily in the terminating direction



- MIEAC is one of several intermediate carriers between the call point of origination and termination
- MIEAC's customer is an IXC that orders service by submitting an ASR
- Customers can interconnect with diverse MIEAC tandems – MIEAC does not charge a flat rate port charge therefore carriers do not have to pay for connections unused
- Carriers interconnect in Minneapolis to reach 95+ RLEC end offices distributed around the state whereas the RBOC requires the IXC to build out to each remote tandem location (11 in Minnesota)
- The originated call is an Interstate toll call and subject to switched access and the function MIEAC provides does not change the categorization of the call

MIEAC as a tandem service provider

MIEAC is one of several intermediate carriers in the call flow between the originating and terminating locations

- MIEAC terminating tandem rates are equal to or less than the RBOC
- MIEAC has no revenue sharing arrangements with LECs or conference providers
- MIEAC has no shareholder relationship whereby the LECs benefit financially from MIEAC tandem services
- MIEAC has no end user customers
- The revenue forecast in MIEAC's TRP filing expressly includes revenue associated with conference calling
- RLECs bill to the closest POI which is equal to the closest RBOC tandem

MIEAC's Position

- MIEAC supports the Commission's proposed access stimulation rules
 - Conference call traffic is subject to switched access charges
 - A rate of return LEC that is a party to a revenue sharing arrangement is required to file revised interstate access rates (based on projected costs and demand)
 - A CLEC that is a party to a revenue sharing arrangement is required to benchmark the applicable RBOC rate
- MIEAC also asks the Commission to make clear that :
 - The proposed rules associated with the terminating LEC do not affect the Commission's access rules for other carriers in the call flow
 - Since the rules apply, the rates apply
 - A rate of return tandem provider that has included in its most recent TRP filing a revenue forecast that includes conference call traffic and which the FCC has allowed to go in effect is entitled to payment at its tariffed rates